

**IN THE COURT OF CRIMINAL APPEALS
 FOR THE STATE OF TEXAS**

JUAN CARLOS FLORES,
 Appellant

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FILED
 COURT OF CRIMINAL APPEALS
 7/16/2020
 DEANA WILLIAMSON, CLERK

vs.

PD-0064-20

THE STATE OF TEXAS,
 Appellee

**MOTION FOR EXTENSION OF TIME TO
 FILE APPELLANT'S BRIEF**

TO THE HONORABLE COURT OF CRIMINAL APPEALS:

COMES NOW JUAN CARLOS FLORES, Appellant, by and through counsel on appeal, Jeromie Oney, and files this motion for an extension of 30 days in which to prepare and file Appellant's Brief. In support of this motion the Appellant would show the following:

1. This cause is styled *Juan Carlos Flores v. State of Texas* and is numbered 069074 in the trial court and No. 05-19-00034-CR in the Court of Appeals – 5th District of Texas, and PD-19-0064-20 in this court.
2. This Court granted the Appellant's Petition for Discretionary Review on June 24, 2020.
3. The Appellant's brief on the merits in this cause is due to be filed in the Court of Criminal Appeals on or before July 24, 2020.
4. This is the Appellant's first request for an extension of time to file his brief.

5. The Appellant hereby requests an extension of thirty (30) days, until August 23, 2020, to file his brief as attorney for Appellant has not had sufficient time to prepare Appellant's Petition for Discretionary Review on or before July 24, 2020.
6. Undersigned counsel has not had sufficient time to prepare Appellant's brief due to an extensive criminal practice that requires personal appearances in several courts in several counties. Additionally, counsel has a vacation previously scheduled from July 17th through July 26th.
7. This motion is not filed for purposes of delay, but so that there will be sufficient time to effectively prepare brief.

WHEREFORE, PREMISES CONSIDERED, the undersigned counsel respectfully prays that this Honorable Court extend the time for filing Appellant's brief in this cause until August 23, 2020.

Respectfully submitted,
Switzer | Oney Attorneys at Law, PLLC

/s/ Jeromie Oney
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ATTORNEY FOR APPELLANT

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing Motion for Extension of Time to File Appellant's Brief was served on the Grayson County District Attorney's Office via electronic mail on the 16th day of July 2020.

/s/ Jeromie Oney
Jeromie Oney